

RowVaughn Wells v. The City of Memphis, et al., Case No.: 2:23-cv-02224-MSN-atc
RIDER (for Defendant City of Memphis' designated Rule 30(b)(6) Deponent(s))

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1. Any and all City of Memphis and Memphis Police Department policies, procedures, and training on the use of force. This topic includes but is not limited to any and all policies, procedures, and training on de-escalation during a police stop, escalation of a traffic stop to a use of force encounter, deployment of pepper spray, deployment of a telescoping police baton, escort holds, soft and closed hand holds, hand and foot strikes, handcuffing, segmenting, and restraint devices in effect on January 7, 2023. This topic also includes policies, procedures, and training on the Fourth Amendment's prohibition against excessive force as well as civilians' and custodial subjects' Constitutional rights as they relate to the use of force. This topic also includes policies, procedures, and training on police officer's duty to intervene when they witness an officer commit an excessive, unjustified, and/or unnecessary use of force.
2. Any and all City of Memphis and Memphis Police Department policies, procedures, and training on the detention and seizure of civilians. This topic includes policies, procedures, customs, and training addressing arrests, detention, *Terry* stops, foot pursuits, uses of force, traffic stops, investigations of individuals believed to have taken illegal drugs, probable cause, and reasonable suspicion.
3. Any and all City of Memphis and Memphis Police Department policies, procedures on hiring personnel. This topic includes but is not limited to information considered, obtained, and investigated regarding potential candidates for hire, position vacancies, certifications and/or formal education required of medical personnel, and the criteria used to select officers to join the SCORPION unit, including prior arrest records, employment records, performance at the police academy, educational background, prior disciplinary records, prior civilian complaints, background reports, prior performance at the Memphis Police Department or any law enforcement or security agency.
4. Any and all City of Memphis, Memphis Police Department's policies, procedures, and training on summoning and/or providing medical attention to a subject that officers encounter, arrest, detain, chase, use force against, or otherwise interact with in the course of their duties. This topic includes policies, procedures, and training regarding standardized interventions, the provision of medical attention to a handcuffed, compliant, and/or restrained subject, the provision of medical attention to an individual who is believed to be intoxicated, the applicable chain of command when agents of the Police Department and the Fire Department are at the scene where a civilian requires medical attention, the division of responsibility between Police personnel, Fire personnel, and Medical personnel at a scene where an individual requires medical attention, the applicable protocol to seek medical care for an individual or request an ambulance, information relayed to officers and/or medical personnel prior to arriving at a scene where a subject requires medical attention, information relayed to providers that will be providing care to the individual once moved off scene, and the provision of medical care to a critically injured individual, the transportation of an individual requiring medical attention, available resources for officers to provide medical attention, and the timely assessment of an individual requiring medical attention.

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5. Any and all Memphis Police Department policies and procedures for investigating officers accused of police misconduct and excessive force, as well as policies and procedures for disciplining, terminating, or recommending for criminal prosecution those officers who are found to have committed a policy violation or other instance of misconduct, including the use of force.
6. Any and all City of Memphis, Memphis Police Department and/or Memphis Fire Department policies, procedures, and training addressing the transmittal of information regarding an incident from City of Memphis personnel to members of the public. This topic includes but is not limited to policies, procedures, and training relating to a police officer's communication with the family members of an individual that a City of Memphis police officer has recently detained, arrested, chased, and/or used force against.
7. Any and all City of Memphis, Memphis Police Department and/or Memphis Fire Department policies, procedures, and training regarding the SCORPION Unit. This topic includes information regarding the creation, chain of command, and supervision of officers belonging to the SCORPION Unit. This topic also includes allegations of misconduct against the SCORPION Unit (including but not limited to allegations involving the use of force) and personnel involved with the SCORPION Unit, the purpose of the SCORPION Unit. This topic also includes policies, procedures, and customs applicable to the SCORPION Unit and any training provided to or undergone by SCORPION Unit personnel.
8. Any and all City of Memphis and/or Memphis Police Department training for new recruits or new hires for sworn officer positions, including, but not limited to, the training officers undergo in the police academy, field training, on the job training, policy training, police procedure training, team or assignment training, training on Constitutional rights of citizens, and new applicant training.
9. Any and all Memphis Fire Department's policies, procedures, and training on providing medical care to a subject that police officers encounter, arrest, detain, chase, use force against, or otherwise interact with in the course of their duties. This topic includes policies, procedures, and training regarding standardized medical responses and/or interventions, the provision of medical attention to a handcuffed, compliant, and/or restrained subject, the provision of medical attention to an individual who is believed to be intoxicated, the applicable chain of command when agents of the Police Department and the Fire Department are at the scene where a civilian requires medical attention, the division of responsibility between Police personnel, Fire personnel, and Medical personnel at a scene where an individual requires medical attention, information relayed to medical personnel prior to arriving at a scene where a subject requires medical attention, information relayed to providers that will be providing care to the individual once moved off scene, and the provision of medical care to a critically injured individual, the transportation of an individual requiring medical attention, available resources for medical personnel to provide medical attention, and the timely assessment of an individual requiring medical attention.